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Attorney for Defendant
JOSE CURIEL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:22-cr-000151-WBS
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE STATUS CONFERENCE AND
v.)	EXCLUDE TIME
)	
JOSE CURIEL, ET AL)	
)	Date: December 12, 2022
Defendants.)	Time: 9:00 a.m.
)	
)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel, Assistant United States Attorney Justin Lee, counsel for plaintiff, Assistant Federal Defender Megan T. Hopkins, counsel for defendant Jose Curiel, and Clemente M. Jimenez, counsel for defendant Roberto Tostado-Cadenas, that the status conference scheduled for October 3, 2022, be continued to **December 12, 2022, at 9:00 a.m.**

The government has provided defense counsel with more than 400 pages and several media files of initial discovery, which defense counsel is in the process of reviewing the initial discovery and conducting investigation. The parties believe a continuance to December 12, 2022, will permit defense counsel the additional time necessary to conduct pretrial investigation and engage in pre-plea negotiations.

1 The parties agree that the ends of justice served by resetting the status conference date
2 outweigh the best interest of the public and the defendant in a speedy trial. Therefore the parties
3 agree that time is excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).

4
5 Dated: September 26, 2022

Respectfully submitted,

6 HEATHER E. WILLIAMS
7 Federal Public Defender

8 /s/ Megan T. Hopkins
9 MEGAN T. HOPKINS
10 Assistant Federal Defender
11 Attorney for Defendant
12 JOSE CURIEL

13
14 Dated: September 26, 2022

/s/ Clemente M. Jimenez
15 CLEMENTE M. JIMENEZ
16 Attorney for Defendant
17 ROBERTO TOSTADO-CADENAS

18
19 PHILLIP A. TALBERT
20 United States Attorney


21 Dated: September 26, 2022

/s/ Justin Lee
22 JUSTIN LEE
23 Assistant United States Attorney
24 Attorney for Plaintiff

25
26 **ORDER**

27 **IT IS HEREBY ORDERED** that the preliminary hearing scheduled for October 3, 2022,
28 at 9:00 a.m. is continued to **December 12, 2022, at 9:00 a.m.** The time period between October
3, 2022 and December 12, 2022, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. §
3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance
outweigh the best interest of the public and the defendant in a speedy trial.

Dated: September 30, 2022


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE